

FILED

8/9/2023

UNITED STATES DISTRICT COURT  
Nathan Ochsner, Clerk of Court  
SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

United States Courts  
Southern District of Texas  
FILED

JUL 12 2023

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA

v.

RENE SALDANA

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§

CRIMINAL NUMBER

C 23 - 357  
**SEALED**

FIRST REDACTED  
INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

Between on or about May 12, 2023, and on or about June 12, 2023, in the Corpus Christi Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

RENE SALDANA

did knowingly conspire and agree together and with other persons known and unknown to the Grand Jury, to ship, transport, transfer, cause to be transported, and otherwise dispose of one or more firearms to another person, in and affecting interstate and foreign commerce, knowing and having reasonable cause to believe that the use, carrying, and possession of the firearm by the recipient would constitute a felony (as defined in section 932(a)).

In violation of Title 18, United States Code, Sections 933(a)(1), (a)(3), and (b):

COUNT TWO

Between on or about May 12, 2023, and on or about June 12, 2023, in the Corpus Christi Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

RENE SALDANA,

[REDACTED]

did knowingly transfer and possess machineguns to wit: Glock-type 3D printed conversion devices having no manufacturer's marks and no serial number, parts which are designed and intended solely and exclusively for use in converting a weapon into a machinegun, that is, "Glock Switches," and is; therefore, a machinegun as defined in Title 26, United States Code, Section 5845(b). These firearms were required to be registered and were not in fact registered to the defendants in the National Firearms Registration and Transfer Record.

In violation of Title 26, United States Code, Sections 5841, 5861(e), and 5871.

COUNT THREE

Between on or about October 1, 2022, and on or about June 12, 2023, in the Corpus Christi Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

RENE SALDANA,

did knowingly transfer and possess machineguns to wit: Glock-type 3D printed conversion devices having no manufacturer's marks and no serial number, parts which are designed and intended solely and exclusively for use in converting a weapon into a machinegun, that is, "Glock Switches," and is, therefore, a machinegun as defined in Title 26, United States Code, Section 5845(b).

In violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

COUNT FOUR

On or about June 10, 2023, in the Corpus Christi Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

[REDACTED]

did knowingly possess a machinegun to wit: Glock-type 3D printed conversion devices having no manufacturer's marks and no serial number, parts which are designed and intended solely and

exclusively for use in converting a weapon into a machinegun, that is, "Glock Switches," and is, therefore, a machinegun as defined in Title 26, United States Code, Section 5845(b).

In violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

COUNT FIVE

Between on or about October 1, 2022, and on or about February 16, 2023, in the Corpus Christi Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,



did knowingly possess a machinegun to wit: Glock-type 3D printed conversion device having no manufacturer's marks and no serial number, a part which is designed and intended solely and exclusively for use in converting a weapon into a machinegun, that is, a "Glock Switch," and is, therefore, a machinegun as defined in Title 26, United States Code, Section 5845(b).

In violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

COUNT SIX

Between on or about October 1, 2022, and on or about February 16, 2023, in the Corpus Christi Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendant,

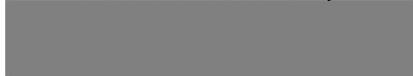


did knowingly possess a firearm to wit: a Glock-type 3D printed conversion device having no manufacturer's marks and no serial number, a part which is designed and intended solely and exclusively for use in converting a weapon into a machinegun, that is, a "Glock Switch," knowing that the firearm was not identified by a serial number as required by Title 26, United States Code, Section 5842.

In violation of Title 26, United States Code, Sections 5842, 5861(i), and 5871.

NOTICE OF CRIMINAL FORFEITURE

Pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), as a result of the commission of a violation of Title 18, United States Code, Sections 922(o) and 924(a)(2), as alleged in Counts Three, Four, and Five of the Indictment, as well as pursuant to Title 26 United States Code, Section 5872, as a result of the commission of a violation of Title 18, United States Code, Sections 5841, 5861(e), 5861(i), and 5871 as alleged in Counts Two and Six of the Indictment, notice is given that the defendants,

RENE SALDANA,  


shall forfeit to the United States any firearm(s) and ammunition used in commission of the offenses.

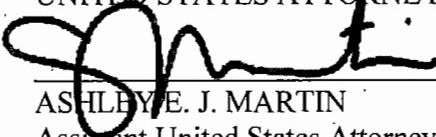
NOTICE OF CRIMINAL FORFEITURE

1. The allegations contained in Counts One of this Indictment is hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 934.
2. Pursuant to Title 18, United States Code, Section 934, upon conviction of an offense in violation of Title 18, United States Code, Section 933, the defendants,

RENE SALDANA,  
[REDACTED]

shall forfeit to the United States of America any property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as the result of such violation; and any of the defendants' property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

A TRUE BILL:  
ORIGINAL SIGNATURE ON FILE  
FOREPERSON OF THE GRAND JURY

ALAMDAR S. HAMDANI  
UNITED STATES ATTORNEY  
By:   
ASHLEY E. J. MARTIN  
Assistant United States Attorney